

James J. Lee
State Bar No. 12074550
jimlee@velaw.com
Michael C. Lee
State Bar No. 24109461
mlee@velaw.com
VINSON & ELKINS LLP
2001 Ross Avenue, Suite 3900
Dallas, Texas 75201
Telephone: (214) 220-7700

Attorneys for Lynn Pinker Hurst & Schwegmann, LLP and The Pettit Law Firm

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:	§	
	§	CASE No. 19-34054-SGJ11
HIGHLAND CAPITAL MANAGEMENT,	§	
L.P., ¹	§	CHAPTER 11
	§	
<i>Reorganized Debtor</i>	§	

**LYNN PINKER HURST & SCHWEGMANN, LLP AND THE PETTIT LAW FIRM’S WITNESS AND
EXHIBIT LIST FOR DECEMBER 4, 2023 HEARING WHEREIN MOVANTS’ SEEK AN ORDER TO
SHOW CAUSE**

Lynn Pinker Hurst & Schwegmann, LLP (“*Lynn Pinker*”) and The Pettit Law Firm (“*Pettit Firm*”) (collectively, the “*State Court Law Firms*”) file this Witness and Exhibit List for the hearing scheduled for **December 4, 2023 at 1:30 p.m. (Central Time)** (or as such hearing may be continued or rescheduled, the “*Hearing*”).

¹ Highland’s last four digits of its taxpayer identification number are (8357). The headquarters and service address for Highland is 100 Crescent Court, Suite 1850, Dallas, TX 75201.

WITNESSES

The State Court Law Firms may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. Michael K. Hurst;
2. Julie Pettit;
3. Any witness necessary to authenticate or prove admissibility of any document;
4. Any witness called by any other party or listed on any other party's witness and/or exhibit list; and
5. Any witnesses necessary to rebut the evidence or testimony of any witness offered or designated by any other party.

EXHIBITS

The State Court Law Firms may offer into evidence any one or more of the following exhibits at the Hearing:

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
A.	<i>Declaration of Julie Pettit</i> (Doc. 3957-2) (Exhibit A to the State Court Law Firms' Response (Doc. 3957))					
A-1.	September 13, 2023 email from Mark Stancil to Julie Pettit, <i>et al.</i> , RE: Meet and Confer (Exhibit A-1 to the State Court Law Firms' Response (Doc. 3957))					
A-2.	January 12, 2022 <i>Temporary Restraining Order</i> in the State Court Action (Exhibit A-2 to the State Court Law Firms' Response (Doc. 3957))					
A-3.	March 29, 2022 Hearing Transcript on Scott Ellington's Motion to Abstain and Remand (Exhibit A-3 to the State Court Law Firms' Response (Doc. 3957))					
A-4.	May 15, 2022 Request for Production from Ellington to Daugherty in State Court Action (Exhibit A-4 to the State Court Law Firms' Response (Doc. 3957))					
A-5.	Text Messages Chain Produced in State Court Action Bates Labeled DEF000236-47 (Exhibit A-5 to the State Court Law Firms' Response (Doc. 3957))					

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
A-6.	July 14, 2022 Patrick Daugherty Deposition Transcript (excerpted) in State Court Action (Exhibit A-6 to the State Court Law Firms' Response (Doc. 3957))					
A-7.	September 1, 2022 Temporary Injunction Transcript (excerpted) in State Court Action (Exhibit A-7 to the State Court Law Firms' Response (Doc. 3957))					
A-8.	September 1, 2022 Temporary Injunction Order in State Court Action (Exhibit A-8 to the State Court Law Firms' Response (Doc. 3957))					
A-9.	August 25, 2023 email chain from Julie Pettit to Blayne Thompson <i>et al.</i> , Re: Letter re: Subpoena to Hon. Russel Nelms (Exhibit A-9 to the State Court Law Firms' Response (Doc. 3957))					
A-10.	July 27, 2023 email chain from Julie Pettit to Joshua S. Levy <i>et. al.</i> , Re: J. Seery – Deposition Subpoena (Exhibit A-10 to the State Court Law Firms' Response (Doc. 3957))					
A-11.	July 13, 2023 Amended Subpoena Ad Testificandum to James Seery in connection with State Court Action (w/ exhibits) (Exhibit A-11 to the State Court Law Firms' Response (Doc. 3957))					
A-12.	September 1, 2023 Order Granting Plaintiff's Fourth Motion to Compel in the State Court Action (Exhibit A-12 to the State Court Law Firms' Response (Doc. 3957))					

EXHIBIT	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE	DISPOSITION
B.	<i>Declaration of Michael K. Hurst</i> (Doc. 3957-3) (Exhibit B to the State Court Law Firms’ Response (Doc. 3957))					
C.	Any motions, pleadings, or other documents filed in this chapter 11 case					
D.	Any exhibits needed to rebut the testimony of witnesses or evidence presented by any other party					
E.	Any exhibit designated by any other party					

The State Court Law Firms reserve the right to supplement or amend this Witness and Exhibit List at any time prior to the Hearing.

Dated: November 30, 2023
Dallas, Texas

Respectfully submitted,

/s/ James J. Lee

James J. Lee
State Bar No. 12074550
jimlee@velaw.com
Michael C. Lee
State Bar No. 24109461
mlee@velaw.com
VINSON & ELKINS LLP
2001 Ross Avenue, Suite 3900
Dallas, Texas 75201
Telephone: (214) 220-7700

*Attorneys for Lynn Pinker Hurst &
Schwegmann, LLP and The Pettit Law Firm*

CERTIFICATE OF SERVICE

I certify that on November 30, 2023, a true and correct copy of the foregoing instrument was served on all counsel of record using the Court's electronic filing system.

/s/ James J. Lee

James J. Lee